

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWMAN DIVISION

IN RE: : CHAPTER 7
:
CHRISTINE ANN ISRAEL, : BANKRUPTCY CASE NO.
:
Debtor. : 04-17006-WHD
:
: JUDGE DRAKE
CHRISTINE ANN ISRAEL, :
:
Plaintiff, : ADVERSARY PROCEEDING NO.
v. :
: 08-1701
U.S. DEPARTMENT OF EDUCATION, :
(substituted for DIRECT LOANS), :
:
Defendant. :

CERTIFICATION BY COUNSEL FOR DEFENDANT

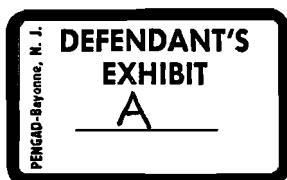
U.S. DEPARTMENT OF EDUCATION OF

GOOD FAITH ATTEMPT TO CONFER AND SECURE

DISCOVERY RESPONSES BY PRO SE PLAINTIFF CHRISTINE ANN ISRAEL

Pursuant to BLR 7037-1(b), the undersigned counsel for defendant U.S. Department of Education hereby certifies that pro se plaintiff Christine Ann Israel and counsel for defendant have exchanged written and electronic communications in an effort to secure further disclosures by plaintiff, in response to defendant's Requests for Production Numbers One, Two, Three, Six, and Seven, without intervention by the Bankruptcy Court.

Because those discussions were not successful, defendant shall be filing with the Court on this date a motion to compel further responses by pro se plaintiff to those discovery responses, which



defendant contends are reasonably calculated to lead to the discovery of admissible evidence in this adversary proceeding.

This 22nd day of December, 2008

Respectfully submitted,

DAVID E. NAHMIAS
UNITED STATES ATTORNEY

/s/ Daniel A. Caldwell
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